

PD-1049-19

IN THE COURT OF COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS

FILED
COURT OF CRIMINAL APPEALS
3/26/2020
DEANA WILLIAMSON, CLERK

ZAID NAJAR

V.

STATE OF TEXAS

On Appeal from the 338th District Court
Of Harris County, Texas
Trial Court No. 1503083

**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE MERITS BRIEF**

Zaid Najar, through Jonathan Landers, files this first motion for an extension of time to file his brief pursuant to Texas Rule of Appellate Procedure 10.5 (b). This motion is made so that counsel can devote the time necessary to adequately represent his client before this Court. Appellant requests an additional 15 days to file his brief, showing specifically:

1. Appellant's brief is due April 2, 2020. The State's Brief was filed on March 3, 2020.
2. The appellant request that the due date be moved to Friday, April 17, 2020.
3. On August 29, 2019, the court of appeals reversed Mr. Najar's conviction and remanded his case back to the trial court. *Najar v. State*, No.14-17-00785-CR

(Tex. App. — Houston, delivered August 29, 2019). On January 29, 2020, this Court granted the State's PDR and noted that oral argument will be permitted in this case.

4. Since the filing of the State's Brief, the coronavirus has spread to Texas, and the state and local governments have taken certain precautions to slow its spread. As a result, counsel's son is out of school, but the school has continued teaching remotely. The school has provided parents with packets to teach their kids at home. Undersigned counsel has been acting as a teacher for his son starting this week.
5. Since the filing of the State's brief, in addition to his normal district court docket, undersigned counsel has been working on the following:
 - A. On March 23, 2020, undersigned counsel, along with Attorney Neal Davis, filed the appellant's brief in Richard Francis Rodrigues v. The State of Texas, pending in the Ninth District Court of Appeals. 09-19-00414-CR.
 - B. Counsel is currently researching and drafting the appellate brief in Anthony Mottin v. State of Texas, 01-19-00249-CR, pending in the First District Court of Appeals. The brief is Due on April 3, 2020. The case was previously abated and was recently reinstated, and the Court has ordered the brief be filed on listed date.
6. Mr. Najjar is not in custody for this offense.

Mr. Najjar respectfully requests a 15-day extension to file his appellant's brief. This request is being made so that undersigned counsel can devote the necessary amount of time to provide his client with effective assistance of counsel, and not for the purposes of delay.

Respectfully submitted,

/S/ Jonathan D. Landers

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LAWYER FOR APPELLANT

CERTIFICATE OF SERVICE

I certify that a copy of this motion has been delivered via the e-file system to the Assistant District Attorney handling this case on 03/26/2020.

/s/ Jonathan D. Landers
Jonathan Landers

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Associated Case Party: State of Texas

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